

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

I, Christopher R. Gulino, being duly sworn, depose and state as follows:

1. I am a Special Agent with the Department of Homeland Security – Homeland Security Investigations (“HSI”) and have been since November 2017. I have nearly fourteen years of law enforcement experience at the local, state, federal and international level. My first assignment with HSI was to HSI New York City’s El Dorado Task Force, where I primarily investigated international drug trafficking and money laundering organizations. I was also deployed to Tegucigalpa, Honduras in 2021, where I investigated human trafficking, human smuggling and narcotics smuggling. I am currently assigned to HSI Springfield, Massachusetts. Prior to my employment with HSI, I was a police officer with the Keene, New Hampshire Police Department, and spent approximately six combined years assigned to the New Hampshire Attorney General’s Drug Task Force and to HSI as a Task Force Officer. I have graduated from three law enforcement academies: (1) the New Hampshire Police Standards and Training Council in April 2009; (2) the Federal Law Enforcement Training Center Criminal Investigator Training Program in March 2018; and (3) HSI’s Special Agent Training in June 2018. In each of these academies, I received training in drug laws, enforcement and detection. I have also taken part in in-service training courses offered by local, state and federal law enforcement, including training regarding drugs of abuse, undercover operations, informants, operational planning, recognition of clan labs, motor vehicle hides, and criminal interdiction.

2. In addition to my law enforcement training, I have experience investigating narcotics traffickers. I have participated in numerous narcotics investigations both as a Special Agent as well as a police officer, during which I have conducted physical surveillance, utilized confidential informants, executed arrest and search and seizure warrants, and conducted court-authorized electronic surveillance. I have testified at trials and hearings in federal, state, and

municipal courts.

3. Based on my training and experience, I am familiar with narcotics traffickers' methods of operation, including methods used by them to distribute, store and transport narcotics and to collect, expend, account for, transport, and launder drug proceeds.

4. I am submitting this affidavit in support of an application for a criminal complaint charging Charialdi TEJEDA-LARA (born 1997) with possession with intent to distribute fentanyl, in violation of 21 U.S.C. § 841(a)(1).

5. This affidavit does not contain all of the information that I have gathered during the course of this investigation. Instead, I have included the relevant facts and information necessary to establish probable cause for the issuance of the requested complaint and arrest warrant.

STATEMENT OF PROBABLE CAUSE

A. Overview of Investigation

6. Over the past several weeks, HSI – with assistance from DEA, Massachusetts State Police (“MSP”), and other law enforcement agencies – has investigated the distribution of fentanyl by TEJEDA-LARA in Worcester County and other locations in Massachusetts.

7. A law enforcement query of TEJEDA-LARA shows that in 2018, he was arrested and charged with distribution of fentanyl by Quincy, Massachusetts Police. That matter resulted in a guilty filed disposition.

8. In March 2022, investigators identified two telephone numbers that TEJEDA-LARA used: (207) 404-1993 and (339) 213-3907.

9. On March 18, 2022, agents¹ issued a subpoena to AT&T requesting tolls and subscriber information for each phone number. AT&T records contained no subscriber information for (207) 404-1993. AT&T records revealed that (339) 213-3907 was subscribed to Charialdi TEJEDA-LARA, at 52 Barton Road, Wellesley, Massachusetts.

10. On three occasions prior to May 25, 2022, an MSP trooper acting as an undercover agent (“UCA”) purchased suspected fentanyl from TEJEDA-LARA. The UCA positively identified TEJEDA-LARA after reviewing TEJEDA-LARA’s RMV photo. TEJEDA-LARA provided the UCA with the telephone number (207) 404-1993 for purposes of contacting TEJEDA-LARA and purchasing the fentanyl. On each occasion, TEJEDA-LARA (a) exited 52 Barton Road immediately before meeting with the UCA and (b) sold approximately 50 grams of suspected fentanyl to the UCA, once in Worcester County and twice in Middlesex County.

B. Search Warrants at TEJEDA-LARA’s Residence and Vehicle

11. On May 25, 2022, the United States District Court issued federal warrants authorizing the search of TEJEDA-LARA’s residence at 52 Barton Road, Wellesley, as well as TEJEDA-LARA’s person and the Ford Explorer SUV used by TEJEDA-LARA during the previous sales to the UCA.

12. Agents executed the warrants that same afternoon of May 25, 2022. Agents stopped TEJEDA-LARA as he operated the Ford Explorer in Boston. Stanley Dunajski – a Wellesley detective and task force officer with the DEA Tactical Diversion Squad in Worcester – was present during the stop and identified TEJEDA-LARA from prior surveillance of him. In the Explorer, agents located and seized approximately two kilograms of suspected fentanyl hidden within a portable air compressor. Agents subsequently tested the substance with a TruNarc field-

¹ Unless specifically noted, the term “agents” is intended to refer generally to HSI Special Agents/Criminal Analysts, HSI or other federal task force officers, and/or state and local police involved in this investigation.

test kit and obtained positive results for the presence of fentanyl.

13. At that same time, agents knocked and announced their presence, and then made entry into TEJEDA-LARA's residence at 52 Barton Road. No persons were present when agents entered the premises. In the kitchen area of the residence, in a hidden compartment in the microwave oven, agents located and seized three firearms (including a loaded 9mm firearm with no serial number), multiple bags of suspected fentanyl, and an estimated 300 grams of suspected heroin. In the hidden compartment, agents also located a prescription pill bottle bearing TEJEDA-LARA's name on it. Agents subsequently tested the substances located in the microwave with a TruNarc field-test kit and obtained positive results for the presence of fentanyl and heroin.

14. In the bathroom of the residence, agents located a trap compartment in the ceiling above the shower. In that trap, agents located and seized an additional quantity of suspected fentanyl. Agents subsequently tested one of the kilograms using a TruNarc field test kit and obtained positive results for the presence of fentanyl.

15. In total, agents seized approximately seven (7) kilograms of suspected fentanyl from 52 Barton Road and approximately two (2) kilograms of suspected fentanyl from the Ford Explorer.

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CONCLUSION

16. Based on the foregoing, I respectfully submit that there is probable cause to believe that Charialdi TEJEDA-LARA possessed with the intent to distribute fentanyl, in violation of 21 U.S.C. § 841(a)(1).

17. Wherefore, your affiant requests that the Court issue the requested criminal complaint.

Respectfully submitted,

Christopher R. Gulino

Special Agent Christopher ~~del~~ Gulino
Homeland Security Investigations

Sworn to via telephone in accordance with Federal Rule of Criminal Procedure 4.1 on
May 26, 2022: 9:03 a.m.

David H. Kennedy
Honorable David H. Kennedy
United States Magistrate Judge

